

Comment Letter I135**I135**

Sallie W. Neubauer
 1501 Cerro Gordo St.
 Los Angeles, CA 90026
 August 31, 2004

Mehdi Morshed, Executive Director
 CA High Speed Rail Authority
 c/o 925 L Street, Suite #1425
 Sacramento, CA 95814

Re: Draft CA High-Speed Train HST Draft Program Environmental Impact
 Report/Environmental Impact Statement (EIR/EIS)
 SCH 2001042045

Dear Mr. Morshed,

As past president and longtime steering committee member of the Citizens Committee to Save Elysian Park, a group of volunteer activists who since 1965 have been saving Elysian Park, Los Angeles' oldest and second largest park from encroachments, I am writing to strongly oppose any plan to put rail through Taylor Yard and the Cornfields. These are newly created State Parks that the Draft EIR/EIS does not even acknowledge! The urban core community around these new parks fought long and hard for them. I know with certainty there would be much public outcry against this proposal if anyone knew about it.

Therein lies my second big objection to this proposal. No one—not even the city councilmembers who represent Taylor Yard, the Cornfields, and the surrounding neighborhoods—knew about it until last week. Surely something of this magnitude deserves more public input. I strongly condemn this underhanded treatment and trust it will be rectified with widely publicized additional public hearings.

Thank you for your consideration.

Sincerely,

Sallie W. Neubauer

I135-1

200/2004 9:15 P.002/002

ENVIRONMENTAL JOHN AARON

AUG.31.2004 13:27



CALIFORNIA HIGH-SPEED RAIL AUTHORITY



U.S. Department
 of Transportation
**Federal Railroad
 Administration**

Response to Comments of Sallie W. Neubauer, August 31, 2004 (Letter I135)

I135-1

Please see standard response 6.24.2. Please also see standard response 8.1.16.

Comment Letter I136

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I136

E-mail message

From: MPetitjean@webtv.net(Margaret Petitjean)
Date: Thu, Aug 19, 2004, 1:16pm
To: CITY.COUNCIL@MENLOPARK.ORG, WLM@jsmf.com, ksteffens@menlopark.org, dsboesch@menlopark.org, smartgrowth@abag.ca.gov, senator@boxer.senate.gov, bentley@ble.org, senator.sher@sen.ca.gov, Michael.N.Lewis@Parsons.com, paynec@samtrans.com, city_council@city.palo-alto.ca.us, Diana@DianaDiamond.com, senator@feinstein.senate.gov, e63@cpuc.ca.gov, matt.welbes@fta.dot.gov, Governor@Governor.ca.gov, mcavoyi@samtrans.com, JimBigelow@yahoo.com, joe.simitian@asm.ca.gov, jskatz@stanford.edu, jrahimi@menlopark.org, feith.ken@epa.gov, joseph_kott@city.palo-alto.ca.us, board.secretary@vta.org, info@mtc.ca.gov, boardsecretary@caltrain.com, frits.vanderlinden@sun.com, Holik@samtrans.com, Ron.Ries@fra.dot.gov, rundell1@leland.stanford.edu, r9.info@epamail.epa.gov, BoardSecretary@samtrans.com, senator.speier@sen.ca.gov, jhill@co.sanmateo.ca.us, mnevin@co.sanmateo.ca.us, rosejg@co.sanmateo.ca.us, editorial@paloaltoailynews.com, letters@smindependent.com, Tweil@igc.org, Bobcast444@aol.com, Kim@transcoalition.org, President@whitehouse.gov, editor@cAlmanac.com, annagram@mail.house.gov, ashok_aggarwal@city.palo-alto.ca.us, cdiery@stanford.edu, david@ecomagic.org, David.Valenstein@fra.dot.gov, cdilauro@aol.com, Frankli@quiknet.com, citz4dBAbate@webtv.net
Subject: California High Speed Rail

Hon. Mayor and Councilmembers, et al

Regarding the Resolution being sent to Sacramento by the city Menlo Park, to be signed by the mayor, before the comment period ends on August 31, 2004, it is questionable whether a preference for the route of the HST should be included, as was pointed out by councilman/attorney, Nicholas Jellins and Jim Bigelow of the Chamber of Commerce at the 8/17/04 council meeting.

While it is arguable whether it is appropriate to belatedly opine on deficiencies in the EIR/EIS with regard to mitigation, etc., should not the chosen route be voted on by informed and educated officials and the taxpayers with full knowledge of the controversies after proper public hearings?

The proposed state bond for high speed rail will provide only the state's share for the initial SF-LA system. After that first phase is running, construction will begin on additional lines.

Three years ago the Altamont route was considered carefully and

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dropped for the following reasons:

According to the learned executive director of the official High Speed Rail Authority, Mehdi Morshed, the choice of the Altamont route initially would result in it never reaching the West Bay and San Francisco (where a modern transit terminal is proposed linking all transit modes, including AMTRAK, Caltrain, etc.)

The renovation of the of Dumbarton Rail Bridge at its present location would be inadequate and interfere with shipping. With the Altamont route, an expensive tunnel or a new high rail bridge would be required to cross the Bay. This would severely affect residents on the Dumbarton route and require more expensive mitigation measures.

Even if this were eventually achieved, it would require a three-pronged fork in the tracks, with trains running inefficiently to Oakland, San Francisco and San Jose.

Mr. Morshed has stated publicly that "A study is going to say about Altamont the same thing our screening study showed. Most of us feel that if you do Altamont Pass, you'll never get to the West Bay".

In recent months, Morshed has told Bay Area transportation officials and San Joaquin Valley towns that the Altamont route was ruled out because it would take a bridge or a tunnel or would wipe out homes.

Mr. Rod Diridon assured an audience at a public meeting that there is room on the Caltrain Corridor for the extra set of rails, except in one or two places; San Bruno, for example. The high speed trains cannot operate on the present freight and commuter tracks but would traverse at a slower speed through Peninsula cities.

Opinions have been voiced that safety would be increased by separating trains from traffic at all crossings eliminating congestion, blasting horns and clanging bells. Pollution would be greatly reduced with electrification and would benefit the existing commuter service. Air and noise impacts would be reduced for residents and train engineers, all of whom are under great life-shortening stress with the present polluting system.

Personally, I wish the Caltrain Corridor were moved elsewhere and that the any further construction not take place in my lifetime. Certainly, there should be no more homes built alongside these tracks.

It is especially disconcerting when transportation officials' recommendations are overridden by personal councilmembers' opinions especially if they have not read the EIR/EIS and are relying on competent staff members who ruled out the Altamont route.

The envious lobbyists, environmental extremists and radical activists are spewing misstatements, as usual, upon the ears of the trusting public and local officials. High Speed Trains are not intended for local commuters, bicyclists, etc. (e.g. BayRailAlliance who are opposing the chosen route).

This is a monumental decision which will greatly affect the health, welfare property values and economy of the region and should not be taken lightly in the interests of a few lobbyists and huggers of trees

Comment Letter I136 Continued

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which should not have been planted on the R.O.W. so close to the tracks in the first place. Caltrain officials have suggested Italian Cypress plantings as most appropriate for safety and aesthetic purposes.

Elimination from the Resolution of a route preference is urged and would be most prudent.

Margaret Petitjean, 489 Waverley St., Menlo Park, CA. 94025 Tel: (650) 322-7154

H.O.R.N. (Halt Outrageous Railroad Noise - Peninsula) H.A.L.T. (Homeowners Against Loud Trains - S.F. Peninsula) Citizens for Noise Abatement

S.A.D. (Sleep-deprived Americans Driving)

cc: High Speed Rail, Sacramento ✓ ATTN: DRAFT PROGRAM

COMMENT ON EIR/EIS

MENLO PARK HAS REJECTED HST
IN SAN MATEO COUNTY GOING
THROUGH MENLO PARK. NOT BY
PUBLIC VOTE!!!

FEDERAL RAILROAD ADMINISTRATION : SAFETY · Monday, August 30, 2004 3:33:51 PM · Page 1 of 1
http://www.fra.dot.gov/us/content/1318

DEPARTMENT OF TRANSPORTATION

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Federal Railroad Administration

Interim Final Rule on the Use of Locomotive Horns at Highway-Rail Grade Crossings

July 2004
Contact - Ron Ries
202-493-6285

In response to a legislative mandate, FRA has issued an *Interim Final Rule* for the Use of Locomotive Horns at Highway-Rail Crossings. The rule requires that locomotive horns be sounded as a warning to highway users at public highway-rail crossings. In accordance with a legislative requirement, the rule will not take effect until one year following the date of its publication on December 18, 2003. Until December 18, 2004, the sounding of the locomotive horns at crossings will remain subject to applicable State and local laws.

The rule also provides an opportunity, not available until now, for thousands of localities nationwide to mitigate the effects of train horn noise by establishing new "quiet zones." The rule also details actions communities with pre-existing "whistle bans" can take to preserve the quiet they have become accustomed to.

The comment period on the *Interim Final Rule* ended on April 19, 2004; however, comments received after that date will be considered to the extent possible without incurring additional expense or delay. Comments may be submitted online to docket number 6439 via the U.S. Department of Transportation's online Docket Management System at <http://dms.dot.gov>.

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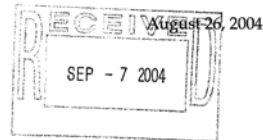
Response to Comments of Margaret Petitjean, August 19, 2004 (Letter I136)

I136-1

Repeated comments. Please see responses for O079.

Comment Letter I137**I137**

Mr. Joe Petrillo, Chair
California High Speed Rail Authority
925 L St., Suite 1425
Sacramento, CA 95814



Dear Mr. Petrillo:

This letter presents comments on the California High Speed Rail Draft Program EIR/EIS.

The DEIR/S is flawed because it omits the possibility of an Altamont Pass alignment as an alternative to tunneling through the more mountainous Mt. Hamilton and Pacheco Pass areas to connect the Central Valley to the Bay Area. As you may know, the Altamont Pass alignment was the recommended preferred alignment of the Intercity High Speed Rail Commission, the predecessor to the California High Speed Rail Authority (HSRA).

An Altamont Pass alignment would follow the existing I-580/I-680 corridor, with the following potential benefits:

- No impact on Henry Coe State Park, the second largest state park in California, including its pristine Orestimba Wilderness
- Less overall growth inducement in wilderness and undeveloped areas
- Less impact on wetlands
- Faster Los Angeles-San Francisco travel times
- Service to over 1 million East Bay and Northern Central Valley residents in Phase I of the project.
- Traffic congestion relief on I-80 and I-580/I-680
- Much faster travel times between the Bay Area and Sacramento
- Cost savings of up to \$2 billion, according to documents in the DEIR/S record.

This Program DEIR/S should not be used to decide which alignment to use. Rather, a new EIR/S should fully explore an Altamont Pass alignment, providing a complete and careful comparison to other alignment options for public comment.

Thank you for your consideration of these comments.

Sincerely,

Mary Ellen Hasbrouck
1301-B San Domar Drive
Mountain View, CA 94043

I137-1

Response to Comments of Mary Ellen Hasbrouck, August 26, 2004 (Letter I137)

I137-1

Please see standard response 2.18.1.

Comment Letter I138

I138



Architecture 21

www.arch21.org mk@arch21.org
1000 Union Street #207 San Francisco, CA 94133



30 August, 2004

Re: Comments on DEIR/EIS for the proposed California High Speed Rail Project

To whom it may concern:

I have been following the State of California's progress on High Speed Rail since 1980, when I was in the eighth grade, and received the RFP for the initial project. Page 9-2 of the 1996 High Speed Rail Summary Report and Action Plan assumed the financial plan for the project would be on the 1998 or 2000 ballot. Something has gone very wrong with this project.....

California needed this project 20 years ago, soon after the French proved the effectiveness of a new high speed rail system. Sadly, the information and analysis in the current DEIR/EIS is nowhere close to the level needed to move this vital project forward. My questions and comments on some of the most troubling assumptions in the DEIR/EIS are included in the following text.

I would be very happy to meet with staff and consultants to further clarify my questions and comments.

-Michael Kiesling

Notes on CHSRA DEIR/EIS

The document overreaches the scope of a Program-Level EIR/EIS. The document seeks to predict the intrastate transportation infrastructure for the year 2020, and then find the best way to meet the (assumed) projected demand. At this macro-level, it defines a high speed rail system to meet the projected demand. It then develops improvements and expansions to the existing highway and air travel infrastructure to meet the same projected demand. These constitute the project alternatives, listed in Section 2.1 of the DEIR/EIS, page 2-1. The alternatives to be studied are:

2.1.1 No Project Alternative - assumes planned improvements to the existing transportation infrastructure



2.1.1 Modal Alternative - "potentially feasible" highway and aviation system improvements

2.1.2 High Speed Train Alternative - "reasonable and feasible" alignment and station options.

Why does this project level DEIR/EIS go beyond the stated alternatives in Section 2 and enter in to the question of defining a single HSR alignment and route?

Demand was predicted prior to the initiation of the EIR/EIS. Why not satisfy the program level EIR/EIS by determining the environmental superiority (or not) of a HSR alternative prior to establishing a set alignment? Isn't there the strong possibility that unforeseen impacts will be unmitigable?

What is the legal threshold between a "program level" and project level" EIR/EIS? Has this threshold been crossed by the CHSRA? Will that threshold be crossed by the CHSRA by using the EIR/EIS to define a single route for implementation?

2.5.2 Modal Alternative Carried Forward

Highway Component

Why is I-680 not considered for improvement? Isn't I-680 a primary route for Bay Area-Sacramento area auto traffic, especially from the Santa Clara and San Ramon Valleys? What was the criteria for determining the highway component of the Modal Alternative? Was this criteria, if it exists, applied evenly throughout the state?

Why are there no highway improvements assumed between the San Francisco Peninsula (I-80, SR-92, SR-84) and the East Bay when there are three stations assumed for the HSR system on the peninsula? How are the 15,630 daily trips (2000 CRA Table E-9) generated by the three peninsula stations to be accommodated by the modal alternative? Is it assumed all these trips will travel via US-101 and SR-152 to reach the Central Valley and Los Angeles? What travel data backs this assumption? Aren't the majority of trips between the San Francisco peninsula and the Central Valley / Los Angeles made via I-580 (Altamont Pass)? Aren't the majority of trips between the greater Bay Area and the Central Valley / Los Angeles made via I-580 (Altamont Pass)?

Existing I-5 between SR-99 and SR-14 is a 8-10 lane facility. Why is it listed in Table 2.5-1 on page 2.19 as a 6 lane facility?

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Aviation Component:

How can it be assumed "future local/regional trips would shift from San Francisco International Airport to Oakland International Airport and the airport in San Jose" (p 2.21)? How will the privately owned and operated airlines shift their service plans to accommodate this assumption? How realistic is this assumption of a reduction of local/regional flights (assumes reduction to accommodate growth in long distance/international flights) when many of the shorter flights serve to fill the longer flights? How does this assumption of a shift in the flights to the two other Bay Area airports affect traffic congestion on the regional highway system? How does this affect the investments in fixed transportation infrastructure to SFO? How do limitations on operating hours (San Jose) and environmental issues (bay fill Oakland) affect this assumption? Where has this planned shift of services between airports happened in the United States? What is the governmental authority to do so?

2.6 High-Speed Train Alternative

Why was the Altamont alternative dropped when the Final Report - Corridor Evaluation, December 30, 1999, states the following about the retained Pacheco Alternative:

"this alternative leads to a Sacramento to San Francisco travel time of 1 hour and 48 minutes, which is not as competitive with other modes of travel compared to the Altamont Corridor alternative."

In other words, Pacheco does not attract as many trips between the Bay Area and Sacramento as does Altamont.....

"the time to San Francisco is only 3 minutes longer".

In other words, trips using the Pacheco alignment are 3 minutes longer to the majority of Bay Area stations.....

or, trips using the Pacheco alignment are 3 minutes longer to the second-busiest station in the system, San Francisco, from every location.

or, trips using the Pacheco alignment are 3 minutes longer for almost 70% of the passengers with origins/destinations in the greater Bay Area...

"the Pacheco Pass option would have more negative environmental impacts as compared to Altamont Pass option."

I138-3
cont.

I138-4



"There would be substantially more water crossings associated with this alignment including over 20 small streams between the San Joaquin River and Los Banos."

Why are travel times and environmental impacts ignored when the decision was made to completely drop the Altamont Alignment from consideration?

Travel Times / Operations

How do longer travel times to the second (San Francisco) and third (Sacramento) busiest destinations on the system meet the goals of fastest travel time? How does a greater than ten-fold increase in wetlands impacts by acre (Altamont 27.4, Pacheco 290.0 - Appendix 2-H CHSRA EIS / EIR - January 2004) reduce environmental impacts? Why is it stated "the greatest benefit of the Pacheco Pass is found in system operations since all trains would pass through San Jose" (p 2.36), when San Jose is not even one of the top five busiest stations? Why was the statement revised from the 9/3/01 report that said, "the greatest benefit of the Pacheco Pass is that all trains would pass through San Jose"?

How do operations improve by creating a system with a greater overall length, especially when operation and maintenance costs are based on train and track miles? How well is equipment utilized if trains must serve both the San Francisco peninsula and San Jose on a single line? San Jose - San Francisco travel time is about 20% of the total trip time for a San Francisco - Los Angeles run, yet trains will run at only 2/3 capacity if they need to serve all Bay Area stations on a single line. Isn't it more efficient to run full trains to their destinations? Wouldn't Altamont be a more efficient way to operate, with a schedule that considers the demand for all stations, providing service balanced to demand?

Given that the system must be constructed in phases, please provide estimated ridership (broken down by station origin and destination) and estimated operating revenue and estimated operating cost for both the initial system, any subsequent phases, and full system build-out. Which choice of initial operating system has the highest return on investment as measured by operating surplus minus borrowing costs? Would an initial operating system via the Altamont Pass provide a higher return on investment by this metric?

If a longer and slower Palmdale alignment is chosen in Southern California for geotechnical or other reasons, how will this affect decrease ridership to and from the Bay Area? How much less would ridership decrease if the system entered the Bay Area via the Altamont Pass, which previous studies showed resulted in a lower trip time for the majority of passengers?

I138-4
cont.

I138-5

I138-6

Comment Letter I138 Continued

**South Bay Wetlands**

The environmental impact of a new bay crossing is given as a reason to eliminate Altamont. Why was the Mulford Line alternative for the San Jose - Oakland line retained in the DEIR/EIS when Altamont wasn't? What was the criteria employed to determine impacts on the South Bay wetlands? The Mulford alternative affects over seven times the acreage of wetlands of the Altamont alternative (Altamont 6.7, Mulford 49.9 - Appendix 2-H CHSRA EIS / EIR - January 2004). Both pass through the Don Edwards refuge. Mulford passes through an area planned for restoration, Altamont doesn't. The Dumbarton line (Altamont) is publicly-owned and planned for reactivation as a publically-operated commute rail service. The Mulford line is owned by the UPRR and operates as a freight railway, along with Amtrak and ACE passenger service. The Mulford line will require a separate facility for HSR. Coordination of service would allow Dumbarton (Altamont) to run on the same facility as the HSR. Is the implementation of a new facility on the Mulford line present fewer impacts than a consolidated facility on the Dumbarton alignment?

Dumbarton HSR Crossing Estimate

Cite a single high speed rail bridge with a cost approaching anywhere close to the \$1.2b quoted for the new Dumbarton crossing. The longest bridge on the new Dutch HSR, over the Hollandsch Diep, is about the same length and has about the same main span as a high-level Dumbarton crossing would, but it cost less to build than even the Authority's previous estimate for Dumbarton, \$300m. From:

<http://enr.construction.com/features/transportation/archives/030630.asp>

Hollandsch Diep

Designed to carry fast, heavy trains on a 2% slope, the bridge has 12, mainly 105-m spans with a continuous single trough deck topped with a 14-m-wide composite concrete slab. The roughly 3-m-deep steel troughs rest on V-shaped pier-top supports of similar dimensions.

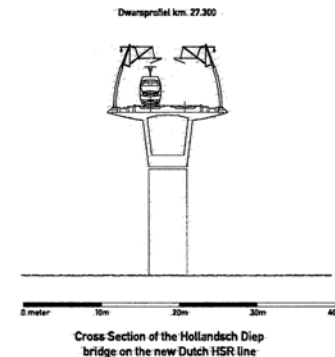
The mainly Dutch, six-firm consortium HSL-Drechtse Steden signed the \$427 million design-build contract in mid-2000, aiming to complete the bridge next May. Two 2.5-km sunken tube tunnels under the Oude Maas and Dordtsche Kil rivers, plus some 9 km of simple track also form part of the contract.

Except for concrete piers, all major elements, including nearly 9,000 tonnes of steel, are prefabricated nearby and delivered by river. Precast concrete caissons, each sunk onto large steel piles, support cast-in-place piers. The 25-m-long x 10-m-wide caissons travelled on pontoons before being sunk into place.



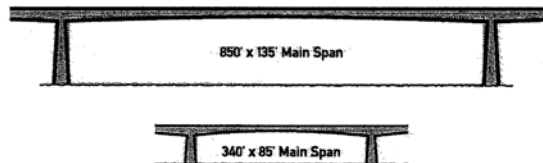
Deck steelwork troughs were barged to site in 60-m lengths, with concrete slabs already attached, all weighing some 1,200 tonne. At each pier top "hammerheads" form the deck support and end sections of each span. Hammerheads are 45-m-long box fabrications made integrally with V-shaped supports of similar proportions bearing on the piers.

Too tall to clear overhead obstructions on the boat ride from the fabricator's yard, hammerheads travelled to the site on their sides, leaving tops slabs to be cast later on the bridge.



The above description of the Dutch bridge seems to be much closer to the requirements and cost for a new Dumbarton crossing than What was the methodology for the \$300m estimate for a Dumbarton Crossing in the initial HSR studies? Why does the DEIR/EIS quote a mitigation cost of up to \$1b, based on the SFO runway expansion project, when no such number was ever cited in the SFO project? How does the estimate for a mid-bay crossing compare to the physical situation at Dumbarton? How does the mid-bay location of the example bridge, a 11.2 mile bridge with the main span about 5 miles from the shore, compare to the location of the Dumbarton crossing?

Comment Letter I138 Continued



The clearance for the bigger span is almost 4x greater

How does the scale of the example bridge, a 850' span and 135' clearance, compare to the required span and clearance of the Dumbarton Bridge, maximum requirement assumed to be 340' x 85'? (based on existing SR 84 bridge). How does the cost inflate so greatly from the \$70m cost (1984 dollars - about \$200m in 2004) for constructing the Dumbarton highway bridge? What is the "high speed factor" (15-20% increase in construction costs) in Appendix 2-J? Is this "high speed factor" applied anywhere else in the project?

Why is it assumed that the proposed commute rail service in the Dumbarton corridor would still run on the old bridge, thus requiring an entirely new corridor for the HSR bridge? Does this assume there would be no commute service on the HSR? If the CRA 1996 draft ridership study assumes stronger demand for a commuter service in the Altamont Corridor than the Pacheco Corridor (for new riders), why is the commute potential of the Dumbarton corridor ignored in the DEIR/EIS?

Operations

Why was ridership modeled for the Altamont alternative based on the assumption that service to the Northern California terminals would be based on an equal split of service? Why wasn't the demand taken into consideration when deciding how to model the ridership differences in the Pacheco vs Altamont alternatives? How does the potential for ridership in Gilroy and Los Banos compare to the potential for ridership in Fremont, Pleasanton-Livermore, and Tracy? If headways play a significant role in the modeling of ridership, why did demand play no role in the assumptions used to model Altamont ridership? What would the results be if the Altamont ridership was modeled with 2/3 of the trains running to San Francisco and 1/3 to San Jose?

I138-9
cont.



What is total ridership for the San Francisco peninsula stations (San Francisco, San Francisco International Airport, Redwood City)? What is the total ridership for San Jose? How do these two numbers compare? Why wasn't service modeled relative to the numbers generated by summing the ridership on the two Bay Area lines?

What does the assumption of both an Oakland and San Francisco terminal do to the overall ridership? How many new riders are gained with the addition of an Oakland terminal, assuming the existence of a San Francisco terminal? What is the cost-benefit analysis of an Oakland extension, assuming a San Francisco terminal?

Is a BART extension to San Jose assumed for the project? How is ridership affected if it is assumed that San Jose riders access the system in Fremont via BART? What is the cost of constructing an extension of BART from Fremont Station to San Jose Diridon Station? What is the cost of constructing HSR from Fremont to San Jose Diridon?

Los Banos Light Maintenance/Storage Facility

How was Los Banos determined to be the best location to service Bay Area trains, when it's over 200km from the terminal in San Francisco? How does the Los Banos location meet the requirement that the light maintenance facility be within a 5-minute trip of the terminal? What criteria was used to determine this location? Are there no other locations closer to San Francisco than Los Banos that could serve as a light maintenance facility? What are the impacts of the Los Banos facility on the surrounding environment, including wetlands?

How does the goal of keeping the right of way alongside Henry Miller Avenue "The route is proposed to be alongside the roadway to minimize disruption to agricultural fields." (Bay Area to Merced High Speed Train Screening Evaluation 9-3-02, p. 62) create the fewest impacts? By keeping the railway right of way immediately adjacent to Henry Miller Avenue, doesn't this require the acquisition and demolition of all homes and most farm structures along the ROW? How is this a benefit? Has an assessment of the number and value of structures along Henry Miller Avenue required for the Pacheco HSR alignment been made? What are the impacts to agriculture if these acquisitions take place? What are the environmental justice issues surrounding condemnation and relocation of the residents of these homes?

I138-10

I138-11

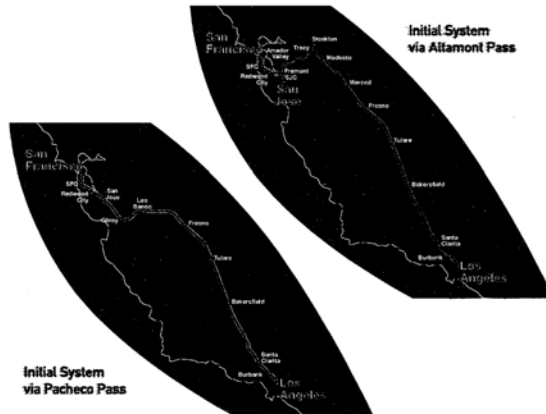
I138-12

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System Ridership

The DEIR/EIS assumes full build-out, but this assumes the initial segment will be successful, as funding is assumed to come from the "profits" of the initial segment. Has the ridership of the initial operating segment, assumed to be San Francisco to Los Angeles, been modeled as a stand-alone system? Do the number of cities served on this initial segment affect ridership? What are the projections for revenue on this initial segment? How many more passengers would an initial Los Angeles - San Francisco system attract if it utilized the Altamont Alternative? How much less expensive would the extension to Sacramento be? What is the ridership on a initial system if it uses the Pacheco alignment?



How great is the catchment for stations? How does the various station locations in Northern California serve the Bay Area? How many miles are passengers expected to travel to reach a HSR station? What is the rush-hour travel time from San Ramon to a HSR station? What is the travel time from San Ramon to the Oakland Airport? Which cities are outside the HSR catchment? What percentage of passengers are expected to access stations via private auto? What demand for parking will exist at Redwood City station?



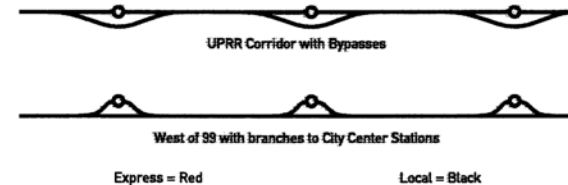
San Jose? SFO? Has a schedule been developed that shows the combined operations of HSR and Caltrain service between San Jose and San Francisco? Has a schedule been developed which shows the combined operations of HSR and high speed commuter service between the Central Valley and the Bay Area?

How was the site for the Los Banos station chosen? Why is there no corresponding station on the Coe/Diablo alignments? What market is served by a station on the west side of the Central Valley in Merced County? How does this affect the potential for sprawl?

Central Valley

A west of 99 route was shown to require 180 acres of farmland, 57% of which is considered prime farmland (December 1999 Corridor Evaluation, p. III-25). Yet a UPRR alignment (along SR-99) would require 250 acres of farmland, 71% prime. The UPRR alignment was estimated in 1999 to cost over \$3b more than the west of 99 alternative. How is farmland preservation aided by dropping the West of 99 corridor? What benefit of the UPRR alignment is worth the added \$3b? What criteria was used in the decision to drop the West of 99 alternative? What criteria was used in the decision to retain the UPRR alternative?

The UPRR alignment runs through the city centers, allowing (obviously) city center station, but the trade off is higher cost (at least \$3b) and greater travel times (15 minutes more than west of 99), assuming reduced speed operations in the city centers, and a longer route (6 miles). To remedy this, the DEIR/EIS assumes high speed bypasses of the larger city centers along the UPRR, and full speed operation through the smaller ones. These bypasses will add to the length of the line (straight line through town vs. curved bypass around town), leaving the "express" line the longer line. This scheme for bypasses around city centers also adds to the \$3b difference in alternatives, because bypasses were not assumed in the original analysis. How much cost do the addition of the bypasses add to the project?

1138-13
cont.

1138-14

Comment Letter I 138 Continued



Assuming a bypass and station line for each major city in the Central Valley, wouldn't the West of 99 alignment result in lower costs, a significantly shorter route, and actually fewer acres of farmland needed for construction? Wouldn't the lines into the city centers cost less, as they could be engineered for lower operating speeds? Depending on service levels, couldn't these lines initially be constructed as single-track spurs, saving initial construction costs? If funding is limited, is there a possibility that ONLY the bypasses or the in-town line will be built in the UPRR corridor? If the decision is made to "phase" the bypasses first in the UPRR corridor, will "temporary" stations be built outside of city centers? With a west of 99 alternative, could the existing Amtrak service serve as an initial feeder to the HSR if some lines into city center stations were deferred?

Why hasn't the mitigation of parcel splits by swapping land on either side of the ROW with adjoining farms been addressed? What is the effect of a HSR alignment along the UPRR corridor on the pressure to bring SR-99 to full interstate status if many interchanges will be built or re-built for the HSR project? How does this upgrade of highway facilities affect sprawl?

Project Costs

How were the estimates for the SFO-Millbrae and Redwood City Station developed? Were these costs checked against Caltrain's recent experience with new station design and construction? Why are many components of the cost of a Fourth and Townsend Station in San Francisco omitted, such as real estate costs, environmental mitigation, etc?

Why are no maps available to complement the detailed capital cost data? There is no way to determine the segments that the capital cost tables refer to, so it is virtually impossible to determine the cost of each alternative where there are a number of sub-alternatives. Please provide detailed maps clearly showing each segment of the project, keyed to the extensive spreadsheets.

Other impacts

Why is there no mention of the San Joaquin Valley National Cemetery? Doesn't the Pacheco alignment cross the cemetery property? How far is the railway from the gravesites at the cemetery? What is the sound impact of the trains on the solitude of the cemetery? How was this significant receptor missed in the study? How many other omissions like this might there be in the DEIR/EIS?

1138-14
cont.

1138-15

1138-16



What is the construction impact on the Coe/Diablo alternatives? How will machinery and workers access the tunnel portals? How many miles of construction roads will be built? How long will it take to bring workers to and from construction sites for each shift? How does this travel time affect the labor cost of the alternative? What amount of energy is required to move in workers and material to the remote construction sites? Where will materials be staged? What impacts does the introduction of large numbers of humans have on the animals in the area? How will the construction roads be removed (will they be removed) and how will the land be restored when construction is complete? How is emergency access provided for the line, once in operation? What effect will wildfire suppression policies have on the operation of the railway in the wilderness?

How realistic is it to assume a station in Santa Clara (to serve Mineta International Airport) and a station in San Jose at the existing Diridon Station? Are these stations not more than 3 miles apart? Why wasn't an analysis of either a San Jose OR a Santa Clara station conducted? Every rail operation, with the exception of VTA's Vasona line, stops or runs past the Santa Clara station, making it as strong a candidate for a Silicon Valley station as Diridon station. Additionally, could not the adoption of the Santa Clara station site reduce the need to add two new levels to Diridon Station, including over a mile of elevated railway tracks?

Thank you for your review of my comments and I await answers to all my questions. I am available to meet with Authority staff or consultants to answer any questions that may arise from the preceding comments.

*Thanks
spinkky*

1138-16
cont.

1138-17

Response to Comments of Michael Kiesling, August 30, 2004 (Letter I138)

I138-1

The Summary of the Draft Program EIR/EIS states, "In the Final Program EIR/EIS, the Authority and the FRA may identify one or more potential alignment options as preferred for the proposed system. In the Final Program EIR/EIS, the Authority and the FRA may also identify one or more preferred station locations within an identified preferred corridor for the proposed HST system" (page S-18). Defining a preferred alignment and station locations for the HST system alternative is consistent with CEQA guidelines for a program-level document and NEPA requirements. The co-lead agencies believe that selecting a preferred alignment and station locations for the HST Alternative meets the requirements of CEQA and NEPA and satisfies the needs of the State, other agencies and the general public.

A "set" alignment has not been established, and will not be established until project-specific environmental documents have been completed and certified. Previous HST studies by the Authority, the Commission and the Department of Transportation were used and incorporated by reference in the Program EIR/EIS. The selection of a preferred alignment takes into account many factors including: ridership potential, connectivity and accessibility, capital and operating costs, compatibility with existing and planned development, and the potential for environmental impacts. Alignment options may be eliminated from further investigation based on impracticability, inability to meet purpose and need and basic project objectives, or if they would have greater impact to the environment than other similar options.

I138-2

CEQA and NEPA guidance suggests that, whether at a program or project level of analysis, the level of information provided should be commensurate with the decisions to be made. The co-lead agencies have determined that there is sufficient information provided in the Program EIR/EIS to select preferred HST alignment and station options for further study with an exception being the northern mountain crossing (see standard response 6.3.1). Please see Chapter 6A of the Final Program EIR/EIS for a description of the preferred HST system of alignment and station options. This Program EIR/EIS document is consistent with the Program EIR process described in CEQA guidelines section 15168.

I138-3

The highway element of the Modal Alternative consists of improvement of the existing highway system that currently serves the intercity travel market in the area proposed to be served by the HST Alternative, including the existing routes identified in Table 2.4-1 and illustrated in Figure 2.4-1 of the Program EIR/EIS. Improvements were identified for specific routes in terms of whole additional lanes based on overall demand in a given corridor. In some cases the entire demand was satisfied with an additional lane applied to a single route, where multiple routes exist in a travel corridor.

Several assumptions were made regarding the highway facilities that would serve the demand in each corridor. Highway travel between the Central Valley and the Bay Area was divided among three main corridors: I-80 – between Sacramento and Oakland/San Francisco, I-580 between the northern Central Valley and the East Bay, and SR-152 between the middle portions of the Central Valley and Gilroy. The trips are assigned to these corridors based on the proportion of demand forecast between these regions and the relative travel times involved. For instance, the entire forecast travel demand between

Sacramento and the Bay Area is assumed to follow the I-80 corridor. In contrast, the forecast travel demand between southern California and the Bay Area is proportioned between the SR-152 and I-580 corridors based on current travel patterns. For the Bay Bridge, the additional demand was assumed to utilize the existing bridge facility, spreading the peak period congestion. The Modal Alternative consists of incremental expansion of existing highway and aviation facilities and the co-lead agencies assumed that it would not be reasonable or consistent to include the development of a new or expanded bay crossing, given the extensive physical and political constraints involved.

In the Central Valley the forecasted travel demand is split between I-5 and SR-99 based on the end points of the trip. Trips originating in southern California destined to the Bay Area and Sacramento are assigned to I-5, while trips either originating or destined to the main Central Valley Cities are assigned to SR-99. Highway travel from Bakersfield to Los Angeles was similarly split to identify capacity improvements to the I-5 (Grapevine) or SR-58/14 routes through the Antelope Valley. Intercity travel to and from cities along the coastal corridor between the Bay Area and Los Angeles was not included in the travel demand forecasts prepared for the proposed high-speed train system as proposed; therefore, trips were not assigned to this corridor. While the coastal corridor (US 101) does represent a potential travel path for intercity trips between northern and southern California, no assigning trips to the coastal corridor (US 101) is reasonable due to the circuitous nature of the US 101 route and the significantly higher travel times compared to the routes through the Central Valley.

Between Los Angeles and San Diego the highway travel demand was assigned to specific routes based existing travel patterns. Trips that do not start or stop in areas along the inland corridor (I-15/I-215) are assigned to the more direct I-5 route. North-south oriented trips were entirely assigned to the I-5 and I-15 facilities while it was recognized that other parallel facilities exist for portions of these routes such as I-110, I-405, SR-73, I-805, and SR 163. All these routes are highly congested and pass through similar surroundings.

At the time of the analysis (2002-3) I-5 was primarily a 6 lane facility between SR 99 and SR 14. Recent improvements have been reflected in the Final Program EIR/EIS.

I138-4

Please see standard response 6.3.1. Differences between the Altamont Pass and Pacheco Pass were documented in Section 2.6.8.F of the Draft Program EIR/EIS. Section 2.6.8.F was removed from the Final Program EIR/EIS as the preferred alternative involves further study of a broad corridor between the Bay area and the Central Valley that includes the Altamont pass.

I138-5

Please see response to Comment I138-4.

I138-6

The program EIR/EIS process does not identify an “initial” system and subsequent phases however it is acknowledged that the system may be completed in phases according to financing arrangements. No initial system and subsequent phases was included in the Authority’s Business Plan. Please see standard response 10.1.7.

The Business Plan does provide a table which presents “Intercity High-Speed Train Ridership and Revenue by Origin-Destination Regional Market Segment for 2020” (Table 3.2, page 23). As stated in the Draft Program EIR/EIS, the I-5 option between Bakersfield and Sylmar was forecast to have 1.7 million more intercity riders by 2020 than the Antelope Valley alignment option using the low-end forecasts (page 6-48). For this forecast, the Business Plan assumed the Pacheco Pass as the mountain crossing between the Bay Area and the Central Valley. The influences on ridership of the Palmdale (Antelope Valley) alignment are documented in Chapter 6 of the Program EIR/EIS under Bakersfield to Sylmar alignments. The ridership and revenue forecasts did not separately address other minor options within the Los Angeles to San Francisco segment.

I138-7

Please see standard responses 6.2.1 and 6.3.1.

I138-8

Please see response to Comment I138-4.

I138-9

Please see response to Comment I138-4.

I138-10

The Draft Program EIR/EIS (Section 6.2) shows total boardings and alightings as a range from low-end to high-end forecasts at Downtown San Francisco (7.8 - 17 million), SFO (1.3 - 2.4 million), Redwood City/Palo Alto (2.3 - 5.0 million) and San Jose (5.0 - 9.6 million). The Authority developed the operating plan in a manner to optimize ridership and revenue by focusing service at the major potential markets. The plan includes 15 express trains between San Francisco and Los Angeles in each direction, 13 of these are "non-stop" and 2 make a single stop at San Jose. Semi-express services (about 7 trains a day each direction) stop at both San Jose and San Francisco, whereas Suburban Express trains (about 14 trains a day each direction), and local trains stop at San Jose, Redwood City/Palo Alto, SFO, and San Francisco.

The Authority's forecasts concluded that there would be no noticeable change in ridership and revenue by having terminus stations at both Oakland and San Francisco (Corridor Evaluation, December 1999). The cost-benefit analysis for the Authority's Business Plan was done for the "Highest Return on Investment Route" which did not include a direct link to Oakland.

The extension of BART to San Jose was not included in the Authority's ridership forecasts. Ridership potential is based on many factors, travel time and number of transfers are significant factors in determining ridership potential. The purpose and potential cost of BART extensions is not the subject of this program environmental review. The HST system between San Jose and Union City via the I-

880 alignment is estimated to cost about \$1.5 billion excluding stations.

I138-11

At the program level of analysis it is assumed that one fleet storage/service and light inspection/maintenance facility is necessary for each major branch of the HST system. These facilities would be best located as near as possible to the terminal stations. A number of potential sites were considered in each region in the Program EIR/EIS to provide representative impacts and costs for the HST system. The potential sites considered for the Bay Area to Merced region included urban sites such as West Oakland as well as sites outside the constraints of urban development including Los Banos – the urban constraints are particularly challenging along the Caltrain corridor to Transbay Terminal. These potential sites provided a representative range of cost and impact and are not a complete and inclusive list of all possible locations. Additional sites will be considered during subsequent project level environmental review.

I138-12

In an effort to minimize impacts to the Grassland Ecological Area (GEA) and farmland resources, the conceptual HST Pacheco Pass alignments were assumed to be immediately adjacent to an existing roadway, Henry Miller Road. Adjacency to an existing facility minimizes potential impacts to surrounding resources by avoiding severance of the properties involved. Specific impacts will be identified and evaluated during subsequent project level environmental review, based on more precise information regarding location and design of the alignments and facilities proposed, as well as the parcel specific existing land uses. The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize and mitigate potential impacts. Only after the alignment is refined and the facilities are fully defined through project level analysis, and avoidance and minimization efforts have been exhausted, will specific impacts and mitigation measures be addressed.

I138-13

Please see response I138-1.

The catchment area for stations varies depending on the number of stations modeled. The overall catchment area for the HST system is described in the “Independent Ridership and Passenger Revenue Projections for High-Speed Rail Alternatives” (Charles River Associates, July 1996, pages 5-17 through 5-20) and includes all of California’s major metropolitan areas. The co-lead agencies believe that the various station locations in Northern California serve the Bay Area well, however please also see standard response 6.3.1. The number of miles passengers would travel to reach HST stations would vary depending upon local market factors and the other transportation alternatives available. Site-specific local travel issues are beyond the scope of this program EIR/EIS process and will be addressed in future project specific documents. San Ramon is about 20-25 miles to Union City and about the same distance to Oakland Airport.

The percentage of passengers expected to access HST stations via private autos varies depending upon the station location and its connectivity to other modes of transportation. For the Draft Program EIR/EIS, estimates were made for parking requirements and potential traffic impacts around potential station locations. These estimates are included in the Traffic, Transit, Circulation and Parking Technical Reports (for the Bay Area to Merced, see Appendix B2). The percentages of passengers expected to access stations via private auto varied between 20% (10% self parking, 10% drop-off) at San Francisco to 80% (60% self parking, 20% drop-off) at Los Banos. The estimate for Redwood City/Palo Alto was 65% via private auto (35% self, 30% drop-off). The assumption for the Bay Area – Merced region was that the HST system will require parking at all station areas except downtown San Francisco, Oakland, and the three major airport stations. Based on the high-end forecasts, nearly 2,200 parking places would be needed at Redwood City/Palo Alto, and about 1,800 at San Jose.

Please see standard response 6.11.1. The potential Los Banos site originated as part of the Commission’s investigation (1994-96). For the I-5 option through the Central Valley, the Los Banos station served the Los Banos and Western Merced population as well as provided access to Central Valley cities along the State Route 99 corridor such as Fresno and Merced. This station site was also investigated as part of the State Route 99 options in order to present the most appropriate comparison between the two corridor options (I-5 and State Route 99). A station site was identified with good access to I-5, SR-152 and that could be built along the high-speed alignment without impacting express travel times.

I138-14

Please see standard response 2.25.1. The costs of additional bypasses are identified in the Draft Program EIR/EIS (Section 6.2). Please see standard response 10.1.7.

The site-specific consideration of mitigation of impacts to land parcels by swapping land on either side of the right-of-way with adjoining farms is beyond the scope of this program EIR/EIS. The effect of a HSR alignment along the UPRR corridor on the pressure to bring SR-99 to full interstate status and decisions about how many interchanges will be built or re-built for the HST project are also beyond the scope of this program EIR/EIS.

I138-15

Capital cost estimates for stations along the Caltrain shared use corridor represent an assumed level of expenditure by the HSRA as part of a joint development effort to implement the shared use corridor. The costs represent an approximation of the costs associated with HST related elements (platforms, track, etc.) of the shared station infrastructure. While the costs of these station elements are based on similar station construction in California, the overall estimated cost to the HST system of the Caltrain shared use corridor is subject to change as the HSRA and Caltrain work together to develop and refine a shared use design.

HST alignment options/segments are mapped and described in Section 2.6 of the Program EIR/EIS. In addition, the configuration and cross section of each segment of each alignment option is illustrated in Alignment Configuration and Cross Sections, January, 2004.

I138-16

Please see standard response 6.3.1. Cemeteries are not included in the primary sensitive resources applied in the noise screening process. The Pacheco Pass alignment option does pass through the vicinity of the San Joaquin Valley National Cemetery. The Authority will continue efforts to avoid this cemetery and associated impacts as this alignment option is considered in subsequent studies.

I138-17

Please see standard response 6.7.1. The Authority has identified a preferred alignment that does not include a potential HST station at Santa Clara.